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California Public Utilities Commission
Legal Division
c/o Fred Harris
505 Van Ness Ave., Room 5040
San Francisco, California 94102
Re: Draft Resolution L-436

Dear Mr. Harris,

I write on behalf of Union Pacific Railroad Company ("Union Pacific") in response to your request for comments on the Commission's Draft Resolution L-436 to amend General Order 66-C.

As a regulated utility, Union Pacific regularly submits safety reports and other documentation to the Commission. Draft Resolution L-436 will subject information contained in these records to public disclosure. Union Pacific agrees that it will be beneficial to hold industry-specific workshops to discuss revisions to G.O. 66-C. Union Pacific hopes that workshops specific to the rail-industry will advance revisions to G.O. 66-C that are consistent with federal regulations on the same subject matter. See 49 U.S.C. § 20903 (protecting rail accident and incident reports from admissibility in civil actions for damages) and 49 U.S.C. §20118 (prohibiting from public disclosure railroad safety analysis records).

Union Pacific is committed to working collaboratively with the Commission to improve rail safety. Please forward to my office information relating to the industry-specific workshops called for in the draft resolution. Thank you.

Sincerely,



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